

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF ALABAMA**

In Re: Sheila & Thomas Newman

Case No. 16-32094

MOTION FOR TURNOVER

COMES NOW Susan Shirock DePaola, hereinafter ("Trustee"), in the above styled matter and pursuant to 11 USC § 521(a)(4) files this motion for a turnover Order issued to:

Alex Taylor
Levin Papantonio
316 South Baylen Street
Pensacola, FL 32502

by stating the following:

1. On August 4, 2016, Thomas Newman (hereinafter the "Debtor") filed a petition seeking voluntary relief under Chapter 7 of the Bankruptcy Code and Susan Shirock DePaola was subsequently appointed as Trustee of the Bankruptcy Estate of Sheila and Thomas Newman.

2. The petition and schedules filed with this Court identified Thomas Newnan's interest in litigation in which he was being represented by the firm of Levin Papantonio.

3. Thereafter on the following dates, the Trustee has made contact with the firm of Levin Papantonio to secure their appointment to represent the Estate in this matter: July 12, 2017, August 22, 2017, September 11, 2017, October 9, 2017, November 7, 2017, November 8, 2017, December 5, 2017, December 20, 2017, January 4, 2018, January 31, 2018 and February 5, 2018.

4. The firm has been unresponsive to these attempts to secure their employment.

WHEREFORE, the above premises considered, the Trustee moves this Honorable Court for an Order directing the firm to surrender the debtor's complete file to the Trustee and she will secure substitute counsel. Movant respectfully requests that this Honorable Court enter an Order granting this Motion for Turnover Order and that this Court grants Movant such other and further relief to which it may be justly entitled.

RESPECTFULLY SUBMITTED on Thursday the 15th day of February, 2018.

S/ Susan Shirock DePaola

SUSAN SHIROCK DEPAOLA
560 SOUTH McDONOUGH STREET, STE. A
MONTGOMERY, ALABAMA 36104
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BRTRUSTEE@WOWWAY.COM

Certificate of Service

I hereby certify that a copy of the above and foregoing motion has been electronically filed with the Court and served by first class mail on the following on this the 15th day of February, 2018.

Alex Taylor
Levin Papantonio
316 South Baylen Street
Pensacola, FL 32502